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SEP 16 1988

Peter Tannenwald
(202) 857-6024

September 16, 1988

Federal Communications Commission
Office of the Secretary

H. Walker Feaster, Acting Secretary
Federal Communications Commission
Washington, D. C. 20554

MM 87-268

Dear Mr. Feaster:

Submitted herewith are 24 copies of a letter delivered to the Chairman and other Commissioners today from the Presidents of the Public Broadcasting Service and the National Association of Public Television Stations.

This letter discusses the overall issue of interference to broadcast television reception and may be deemed to address the subject matter of several pending rule making proceedings. Pursuant to Section 1.1206(a)(1) of the Commission's Rules, I am submitting herewith two copies of the letter for each of those proceedings. The proceedings are listed below.

If there are any questions about this matter, please contact the undersigned.

Very truly yours,



Peter Tannenwald

Attachment

cc: (w/att) Wallace E. Johnson, President, ABES
Margita White, President, AMST
Eddie Fritts, President, NAB
Preston Padden, President, INTV
Donald E. Ledwig, President, CPB
Douglas Bennet, President, NPR
Thomas P. Stanley, Chief Engineer,
Office of Engineering and Technology
John R. Haring, Chief, Office
of Plans and Policy
Alex D. Felker, Chief, Mass Media Bureau
Mr. Bruce Christensen
Mr. David J. Brugger

H. Walker Feaster, Acting Secretary
September 16, 1988
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For the following proceedings:

Docket 20418
GEN Docket 83-806
GEN Docket 84-467
GEN Docket 87-379
GEN Docket 85-172
MM Docket 86-112
MM Docket 86-144
MM Docket 87-121
MM Docket 87-267
MM Docket 88-140
MM Docket 87-268
RM-6362

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SEP 16 1988

Federal Communications Commission
Office of the Secretary

Public Broadcasting Service
1320 Braddock Place
Alexandria, VA 22314

National Association of Public Television Stations
1350 Connecticut Avenue, N.W.
Suite 200
Washington, DC 20036

September 16, 1988

Dennis R. Patrick, Chairman
Federal Communications Commission
1919 M Street, N.W.
Room 814
Washington, D.C. 20554

Dear Chairman Patrick:

We are writing on behalf of the Public Broadcasting Service (PBS) and the National Association of Public Television Stations (NAPTS) to urge you to give serious consideration to the letter sent to you by six broadcast organizations, dated August 3, 1988 and presented in various Commission dockets on August 12, 1988 (Public Notice 4120, August 12, 1988). The August 3 letter expresses concern about a trend in Commission actions that permits increasing interference and technical degradation in the broadcast services. PBS and NAPTS share this concern.

It is the mission of our member public television stations and PBS to bring the highest quality television programming to as many of the people of the United States as possible. We strive to deliver excellence in all respects, not only in the content of our programming but also in the technical quality of the signals transmitted by our member television stations.

If, however, public broadcasters are to fulfill their responsibility to provide clear pictures and sound, they must have clear spectrum. Our job in providing high quality signals in our core service areas -- and in reaching fringe areas at all -- is made much more difficult by overcrowding of the spectrum and the permeation of the television band by non-conforming uses that are often mobile and difficult to trace.

1. PBS, for example, was the first nationwide broadcast television distributor to use satellite distribution, thus enhancing and extending its signal. PBS also pioneered the use of stereo sound and captioning for the hearing impaired. We are now actively participating in the development of advanced television.

Dennis R. Patrick, Chairman
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We know how scarce spectrum is and how much demand there is for it. Many proposed uses of the spectrum appear meritorious and costless when standing alone. However, as the August 3 letter properly stresses, the cumulative impact of many spectrum use decisions -- each of which has only a minor impact in itself -- is to impose tremendous cost by degrading our nation's only free, universal and locally-based communications medium, broadcasting.

This concern is intensified in light of the imminent developments in advanced television. We strongly support the Commission's recent decision emphasizing that ATV capability is important to the survival and continued competitiveness of terrestrial broadcasting. (FCC 88-288, Released September 1, 1988.) But such future capability is a mirage if, in the meantime, the technical integrity of broadcasting and the spectrum available to it have eroded. Certainly until the ATV Advisory Committee has devised a final spectrum use plan regarding ATV systems, extreme caution is called for in spectrum decisionmaking. The Commission must not constrain the capacity of broadcasting for future service enhancement by decisions that chip away at the technical quality and spectrum available for broadcasting.

The Federal Communications Commission was created to ensure that spectrum use decisions would be made by a centralized public agency that would measure each proposed use against the long-term public interest. Congress recognized that only the Commission, not the marketplace or individual consumers, could discharge this unique responsibility. To serve the best interests of the public, spectrum use must be measured by the quality, not mere quantity, of the resulting services.

Copies of this letter are being furnished to the Acting Secretary for inclusion in the dockets set forth below.

Sincerely,



Bruce Christensen
President, PBS



David J. Brugger
President, NAPTS

Dennis R. Patrick, Chairman
September 16, 1988
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cc: Commissioner James Quello
Commissioner Patricia Diaz Dennis
H. Walker Feaster, III, Acting Secretary
for Docket 20418; Gen. Dockets 83-806, 84-467, 85-172,
87-389;
MM Dockets 86-112, 86-144, 87-121, 87-267, 88-140,
87-268; RM-6362
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